

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

CHELSEY GOSSE,  
*on her own behalf and on behalf of  
other similarly situated persons,*

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC.,  
U.S. BANK, NA.,  
RATCHFORD LAW GROUP, P.C.  
AND  
NATIONAL COLLEGIATE STUDENT  
LOAN TRUST 2007-3,

Defendants.

Case No: 3:20-cv-01446-RDM

**PLAINTIFF CHELSEY GOSSE'S AMENDED CONSENT MOTION  
FOR EXTENSION OF TIME TO FILE A MOTION  
UNDER FED.R.CIV.P. 23**

Plaintiff Chelsey Gosse, by her undersigned counsel and with the consent of the Defendants, moves the court for an extension of time to file a Motion under Fed.R.Civ.P. 23 and states the following:

1. Fed. R. Civ. P. 23 (c)(1) provides for the Court to consider class certification “[a]t an early practicable time after a person sues or is sued as a class representative.” Given that the court has not issued a case schedule and the Defendants have filed motions to dismiss, it is not practicable at this time for the Plaintiff to file a motion at this time.
2. Under the L.R. 23.3 of the Local Rules for the Middle District of Pennsylvania, plaintiffs filing class actions are required to file a Motion for Class Certification within 90 days of filing the Complaint, absent an extension for good cause.
3. Plaintiff filed her initial class action complaint on August 14, 2020 (ECF 1). Under L.R. 23.3, she would be required to file a Fed.R.Civ.P. 23 motion by November 12, 2020.

4. The parties have not yet provided their Rule 26 disclosures and have not yet exchanged sufficient discovery to support a Fed.R.Civ.P. 23 motion. Further, the Defendants have expressed an intention to pursue preliminary motions.
5. Plaintiff requests an extension of time to file a Fed.R.Civ.P. 23 motion up to and including an additional 60 days to allow discovery to proceed.
6. Plaintiff sought the consent of the Defendants before filing this motion and they advise they concur with the foregoing motion.
7. No party will be prejudiced by granting the requested relief.

Wherefore, for the reasons stated herein, Plaintiff requests that the court extend the time for Plaintiff to file a Fed.R.Civ.P. 23 motion for 60 days.

Dated this 11<sup>th</sup> of November 2020.

Respectfully submitted,

/s/ Robert P. Cocco

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